

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

STATE OF ILLINOIS; JB PRITZKER, in
his official capacity as Governor of the
State of Illinois; JAMES BENNETT, in his
official capacity as Director of the Illinois
Department of Human Rights; KWAME
RAOUL, in his official capacity as Attor-
ney General of the State of Illinois; and
ALEXI GIANNOULIAS, in his official ca-
pacity as Secretary of State of the State of
Illinois,

Defendants.

Case No. 1:25-cv-00669

Judge Coleman

DECLARATION OF R. GABRIEL ANDERSON

I, R. Gabriel Anderson, declare as follows:

1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.
2. I am an attorney at Consovoy McCarthy PLLC. I am counsel in this case for the American Alliance for Equal Rights.
3. I submit this declaration in support of the Alliance's response in opposition to Illinois' motion to strike. The following material is attached as an exhibit in support of that opposition.

4. Exhibit A is a true and correct copy of an email exchange between the Alliance's and Illinois' counsel on April 17, 2025.

Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on May 14, 2025

/s/ R. Gabriel Anderson
Attorney for Plaintiff

Exhibit A



Cam Norris <cam@consovoymccarthy.com>

AAER v. Raoul: Protective Order

Jordan, Elizabeth <Elizabeth.Jordan@ilag.gov>

Thu, Apr 17, 2025 at 4:17 PM

To: Cam Norris <cam@consovoymccarthy.com>, "Bass-Ehler, Karyn" <Karyn.BassEhler@ilag.gov>, "Berlin, Holly" <Holly.Berlin@ilag.gov>, "hilary.pinion@usdoj.gov" <hilary.pinion@usdoj.gov>, "louis.whitsett@usdoj.gov" <louis.whitsett@usdoj.gov>

Cc: Thomas McCarthy <tom@consovoymccarthy.com>, Gabe Anderson <gabe@consovoymccarthy.com>, Matt Pociask <matt@consovoymccarthy.com>

Counsel,

Thank you for your email. We cannot agree to your proposed accommodation. As noted in our motion to dismiss, judicial proceedings are, by default, open and accessible "to enable the proceedings to be monitored by the public." *Doe v. City of Chicago*, 360 F.3d 667, 669 (7th Cir. 2004). We continue to believe that AAER's members' identities are important facts of the case, and that AAER has not made the requisite showing that the extraordinary course of proceeding anonymously is appropriate here. As such, we do not believe a protective order would cure the concerns we raised in our motion.

Best,

Elizabeth

Elizabeth Jordan (she/her)
Assistant Attorney General
Special Litigation Bureau
Office of the Attorney General of Illinois
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From: Cam Norris <cam@consovoymccarthy.com>**Sent:** Thursday, April 17, 2025 11:23 AM**To:** Bass-Ehler, Karyn <Karyn.BassEhler@ilag.gov>; Jordan, Elizabeth <Elizabeth.Jordan@ilag.gov>; Berlin, Holly <Holly.Berlin@ilag.gov>; hilary.pinion@usdoj.gov; louis.whitsett@usdoj.gov

Cc: Thomas McCarthy <tom@consovoymccarthy.com>; Gabe Anderson <gabe@consovoymccarthy.com>; Adam Mortara <adam@mortalalaw.com>; Matt Pociask <matt@consovoymccarthy.com>

Subject: [EXTERNAL] AAER v. Raoul: Protective Order

Friends at Illinois and the United States:

In its motion to dismiss, Illinois has raised the argument that AAER lacks standing because it refers to its members with pseudonyms. Though AAER disagrees with that argument, it could agree to an accommodation where the members' identities are disclosed under a suitable protective order. The protective order would designate the names of these nonprofits (and affiliated persons) attorney's eyes only. So their identities could be disclosed only to the Court (under seal) and as necessary to the parties and their litigating counsel.

If that idea is agreeable in principle, we are happy to circulate a draft. Please let me know as soon as you can, given the relatively tight schedule.

--

Cameron T. Norris

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